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(P)

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.
 Tamar Kareb-Andre WATKINS

Case: 2:15-mj-30358
 Judge: Unassigned,
 Filed: 07-29-2015 At 11:27 AM
 USA v. SEALED MATTER(mlw)(cmp)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of July 6, 2015, in the county of Wayne,
 in the Eastern District of Michigan, the defendant(s) violated:

Code Section
 18 U.S.C. §§ 922(g)(1), 922(j), and 924(c)

Offense Description
 Felon in possession of a firearm, possession of a stolen firearm and
 possession of a firearm in furtherance of a drug offense

21 U.S.C. § 841(a)(1)

Possession with intent to distribute Marijuana

This criminal complaint is based on these facts:

Continued on the attached sheet.


*Complainant's signature*Special Agent Gregory C. Geider, A.T.F.*Printed name and title*

Sworn to before me and signed in my presence.

Date: July 29, 2015

*Judge's signature*City and state: Detroit, Michigan
Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

ORIGINAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

The affiant, Gregory C. Geider, being duly sworn, deposes and states as follows:

INTRODUCTION

1. I have been employed as a Senior Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since January 1988. I am currently assigned to the Ann Arbor Post of Duty in the Detroit Field Division and detailed to the Michigan State Police (State Police), Western Wayne Criminal Investigations.

2. I have been involved in numerous investigations involving violations of federal and state firearm and controlled substance laws. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. State Police and ATF are currently conducting an investigation of Jahmar YOUNG (YOUNG) and Tamar Kareb-Andre WATKINS (WATKINS)

based an offense occurring on or about July 6, 2015 in Bellville and Detroit, Michigan.

PROBABLE CAUSE

4. On the evening of July 6, 2015, State Police executed a state search warrant for records and documents at WATKINS' residence located at 22036 Kessler, Detroit, Michigan 48219. Upon arrival at the residence investigators knocked and announced, "State Police, Search Warrant." Law enforcement encountered and detained a male subject, later identified as WATKINS, at the front door and a female subject in the doorway of the northwest bedroom. Officers first observed a black Taurus model PT1911 semi-auto pistol, .45 ACP caliber with a loaded magazine in plain view on the floor of the northwest bedroom. Officer then observed a .45 caliber cartridge on the hallway floor (outside of the northwest bedroom)

5. Law enforcement continued to search the northeast bedroom and found three plastic bags containing suspected marijuana in the pocket of a jacket hanging on the northeast bedroom door. A subsequent field test indicated positive as marijuana with a total weight of approximately 75 grams. At that time, a second state search warrant, for controlled substances and contraband, was secured.

6. A further search of the northeast bedroom revealed numerous documents in WATKINS' name including a medical marijuana application in

addition to men's clothing and shoes in his size. WATKINS also requested a jacket from the northeast bedroom prior to being transported to the Canton Police Department for processing.

7. Officers found drug packaging materials, including, but not limited to, two boxes of plastic sandwich bags and two digital scales in the kitchen and a box of zip-lock vacuum bags and a zip-lock bag vacuum sealer in the northeast bedroom.

8. Law enforcement also seized the following from WATKINS' person: (1) \$1,359.00 USD; (2) keys to a white Chevrolet Suburban (also parked in the driveway of the residence); and (3) house keys for front door of 22036 Kessler.

9. On July 7, 2015, at approximately 12:51 a.m., after being advised of his *Miranda* rights, WATKINS waived his rights and agreed to speak with investigators. Of import, WATKINS stated:

- The residence located at 22036 Kessler belonged to YOUNG, and that he had been staying in the residence, specifically the northeast bedroom, for approximately one week;
- The property seized from that room, including the marijuana found in the coat pocket, belonged to him.
- He formerly lived in Chicago and was a gang member there;

- In 1998, he was convicted of murder and was incarcerated in Illinois for 15 years and is now off parole;
- The pistol was in the residence for protection and had been on the living room floor when investigators arrived to execute the search warrant; and
- When he heard noises at the front door he picked up the firearm. And when he realized it was the police at the door he walked back towards the northwest bedroom and unloaded the chambered round and then left the pistol in the bedroom before going to the front door.

10. On July 8, 2015, I obtained a copy of WATKINS' criminal history from the Michigan Law Enforcement Information Network, which confirmed WATKINS' murder conviction:

- On March 3, 1999, WATKINS was convicted of Murder in Cook County Circuit Court (Illinois), and sentenced to 30 years' incarceration.

11. The same day, I determined that the Taurus model PT1911 semi-auto pistol, .45 ACP caliber seized from WATKINS' residence had been reported stolen to the Muskegon County Sheriff's Department on or about July 4, 2015.

12. Based on my knowledge, training, research, and experience, the Taurus pistol is a firearm as defined in Title 18, United States Code, Chapter 44,

Section 921(a)(3) and was manufactured outside of the State of Michigan after 1898.

CONCLUSION

13. Based on the above, there is probable cause to believe that on or about July 6, 2015, Tamar WATKINS, a prohibited person, possessed a firearm, specifically a Taurus model PT1911 semi-auto pistol, .45 ACP caliber, in violation of Title 18, United States Code, Section 922(g)(1) and 922(j). Additionally, there is probable cause to believe WATKINS used or carried this firearm while possessing with the intent to distribute approximately 75 grams of marijuana, in violation of Title 18, United States Code, Section 924(c) and Title 21, Section 841(a)(1), in the Eastern District of Michigan.

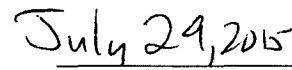


Gregory C. Geider
Senior Special Agent
Bureau of Alcohol, Tobacco and Firearms

Sworn and subscribed before me on this 29th day of July, 2015.



HON. ANTHONY P. PATTI
United States Magistrate Judge



Date